

COMMONWEALTH OF KENTUCKY

BEFORE THE KENTUCKY STATE BOARD ON ELECTRIC GENERATION  
AND TRANSMISSION SITING

In the Matter of:

|                                      |   |            |
|--------------------------------------|---|------------|
| ELECTRONIC APPLICATION OF LOST CITY  | ) |            |
| RENEWABLES LLC FOR A CERTIFICATE OF  | ) |            |
| CONSTRUCTION FOR AN APPROXIMATELY    | ) | CASE NO.   |
| 250 MEGAWATT MERCHANT ELECTRIC SOLAR | ) | 2024-00406 |
| GENERATING FACILITY IN MUHLENBERG    | ) |            |
| COUNTY, KENTUCKY PURSUANT TO KRS     | ) |            |
| 278.710 AND 807 KAR 5:110            | ) |            |

SITING BOARD STAFF'S FIRST REQUEST FOR INFORMATION  
TO LOST CITY RENEWABLES LLC

Lost City Renewables LLC (Lost City Renewables), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on March 21, 2025. The Siting Board directs Lost City Renewables to the Kentucky Public Service Commission's July 22, 2021, Order in Case No. 2020-00085<sup>1</sup> regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a

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<sup>1</sup> Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Lost City Renewables shall make timely amendment to any prior response if Lost City Renewables obtains information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete in any material respect.

For any request to which Lost City Renewables fails or refuses to furnish all or part of the requested information, Lost City Renewables shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied or scanned material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Lost City Renewables shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the Application, Appendix D, Noise Analysis Report. Provide the type of pile driving equipment and pile-driving method to be used during construction.

2. Refer to the Application, Appendix D, Noise Analysis Report. Explain whether local residents will be notified prior to any pile driving, or other noise producing activity.

3. Refer to the Application, Appendix D, Noise Analysis Report, page 18. Explain the components of the Complaint Resolution Program.

4. Explain whether the roadways proposed to be used during the delivery phase of the project have been designated Level of Service (LOS) ratings in the form of a letter grade. If so, provide the rating and the entity that assigned those ratings.

5. Refer to Site Assessment Report (SAR), Appendix G, Traffic Impact Study.

a. Describe the current conditions of Foggy Mill Road, Mason-Poyner Road, and Free Lane.

b. Describe how Foggy Mill Road, Mason-Poyner Road, and Free Lane will be utilized during the delivery and construction phase of the project. Provide what type(s) of vehicle(s) will use each particular road.

c. Provide the width and weight limit ratings, by individual road, for Foggy Mill Road, Mason-Poyner Road, and Free Lane.

d. Describe any repairs or upgrades that will need to be made to Foggy Mill Road, Mason-Poyner Road, and Free Lane prior to the delivery and construction phase of the project.

6. Provide the width and weight limit ratings of all bridges and culverts within a two-mile radius of the project.

7. Describe any repairs or upgrades that will need to be made to any bridges or culverts prior to the delivery and construction phase of the project.

8. Provide the maximum expected load weights for each type of delivery truck, including, but not limited to, cement and water trucks, heavy equipment, gravel for access roads, panels, inverters, and the transformer.

9. Identify the specific roadways used by heavy trucks, by road name, including for delivery of the transformer.

10. Provide the estimated weight of the project's required substation transformer and the truck class necessary for its delivery.

11. Explain whether any oversize or overweight deliveries will require special permits from the Muhlenberg County Road Department and the Kentucky Department of Transportation.

12. Provide a one-page directional map showing the anticipated delivery routes for the project. Include on the map: access roads, access points, existing roads, bridges, electric generation components, and all structures within two miles of the project.

13. Refer to SAR, Appendix G, Traffic Impact Study. The study states, “[f]ive access points will spread construction and worker vehicle entering and leaving the Project Area.” Explain whether workers will enter and leave specifically designated access points based on construction location each day, or whether workers will enter the site across all access points to avoid traffic congestion.

14. Refer to SAR, Appendix G, Traffic Impact Study. Explain whether the mitigation measures stated in the study are suggestions from Copperhead Environmental Consulting or pre-determined measures from Lost City Renewables.

15. Explain whether vehicles used during the delivery and construction phase of the project will cross the abandoned railroad that parallels US 431.

16. Refer to the SAR, mitigation measure 5. Describe the “Perimeter firebreak road.”

17. Refer to SAR, mitigation measure 16. Provide what experience Lost City Renewables and Sunrise Renewables, LLC have constructing solar projects.

18. Refer to SAR, Appendix E, Landscape Plan. Imagery shows much of the site is forested. Provide a narrative description of all proposed vegetative clearing. Include in the response the total anticipated acreage of vegetative clearing.

19. Refer to SAR, Appendix E, Landscape Plan. Provide an explanation for selecting a site that is heavily forested and would require substantial vegetative clearing.

20. Confirm if the project has been designed to minimize the amount of vegetative clearing required. If confirmed, identify the design elements that will minimize vegetative clearing and explain how those design elements will reduce vegetative clearing.

21. Describe and provide information regarding what federal and state agencies that Lost City Renewables is coordinating with in order to plan the tree clearing strategy for protected bats.

22. Explain whether there is a mitigation plan for endangered bats. If so, provide any supporting documentation.

23. Provide a map depicting all planned areas of vegetative clearing. Include on the map satellite imagery, wetland features, and elevation contours.

24. Explain the process of preparing an area for construction after vegetative clearing has occurred.

25. Explain how Lost City Renewables plans to mitigate flood risks within the site after vegetative clearing.

26. Refer to SAR, Appendix K, Stream and Wetland Delineation, Conclusion, page 13:

a. Provide what permits Lost City Renewables will have to acquire for the wetland features considered jurisdictional.

b. Provide what state and federal regulations Lost City Renewables will have to follow for the wetland features considered jurisdictional.

c. Explain whether appropriate setbacks have been applied to all 79 wetland features within the site.

27. Given the extensive vegetative clearing planned for the project, explain how Lost City Renewables will avoid surface runoff into the 79 wetland features that exist within the site.

28. Explain how grading will affect surface runoff, particularly on sloped terrain, within the site.

29. Provide what erosion prevention measures Lost City Renewables will implement during construction of the proposed project.

30. Describe how the natural habits that exist within areas that are planned to be deforested will be protected.

31. Explain how Lost City Renewables will combat the possibility of displaced wildlife as a result of vegetative clearing.

32. Provide the total length, in feet, of vegetative screening planned for the project.

33. A TVA-owned, 69 kV transmission line intersects the project:
- a. Provide a copy of all communication with TVA regarding the project and outline any concerns that were raised.
  - b. Provide the appropriate setbacks, easements, and rights-of-way from the transmission line. Include in the response a map outlining the right of way of the transmission line.
  - c. Provide a plan for Lost City Renewables to avoid all transmission lines that intersect the proposed project.

34. A 10" interstate natural gas pipeline owned by Texas Gas intersects the project:

- a. Provide a copy of all communication with Texas Gas regarding the project and outline any concerns that were raised.
- b. Provide the appropriate setbacks from the pipeline, include any contractual setbacks or federal safety guidelines.
- c. Provide any agreements or contracts that have been made with or entered into with Texas Gas.
- d. Provide how Lost City Renewables proposes to avoid all pipelines, especially with underground components such as the AC collection system.

35. Provide a detailed table listing all residential structures located within 2,000 feet of the project boundary line. For each structure, provide:

- a. The distance to the boundary line.
- b. The distance to the closest solar panel.
- c. The distance to the nearest inverter.

d. The distance to the substation.

36. Provide a detailed table listing all non-residential structures located within 2,000 feet of the project boundary line. For each structure, provide:

a. The distance to the boundary line.

b. The distance to the closest solar panel.

c. The distance to the nearest inverter.

d. The distance to the substation.

37. Refer to the Kentucky Geological Survey Oil and Gas Wells Search (<https://kgs.uky.edu/kygeode/services/oilgas/>):

a. File a map with all active and inactive oil or gas wells on the proposed site. Include any gas-gathering pipelines associated with the wells.

b. Determine and confirm whether any of these wells are currently permitted and active. If the well is not active, designate the well as inactive on the map provided in response to Item 37(a).

c. Confirm whether the existence of oil and gas wells and pipelines will require adjustments to the proposed location of solar panels. If not confirmed, explain the plan to avoid the areas.

38. Explain how the proposed electric transmission line route was determined.

39. Provide the total length of cabling to be used in the projects' collection system.

40. Explain if the medium voltage (MV) collection system will be underground, above ground, or both. If the MV collection system will be underground and above



ground, provide a map that shows which segments are underground and which segments are above ground.

41. Provide information on any fiber optic or communication network installed as part of the project and any excavation that may be required for the installation.

42. Explain whether construction activities will occur sequentially or concurrently across the project site.

43. Identify all churches or other religious facilities within a two-mile radius of the project on a map. Provide the corresponding distances from the facility to the closest site boundary.

44. Provide any communication with churches or other religious facilities regarding the project. Provide a summary of any concerns that were raised.

45. Provide the location of all cemeteries within a two-mile radius of the project on a map and explain whether the project will restrict access to the cemeteries in any way.

46. Refer to SAR, Appendix B, Preliminary Site Layout. The site layout shows the project boundary line intersects across a proposed solar array area at the top of the most southeastern section; therefore, excluding the proposed substation and surrounding solar arrays from the project boundary. Confirm this is an error and provide an updated site plan with the amended line. If not confirmed, describe the layout and how it complies with all statutory and regulatory requirements as is.

47. Provide a narrative description of the location of each laydown area to be used during construction.

48. Provide a narrative description of the location of each of the following site features:

- a. Each construction entrance.
- b. Each entrance to be used in operations.
- c. Operation & Maintenance (O&M) area.
- d. Each laydown area.

49. Provide a list of permits that will be required from any other local, state, or federal agencies for the project. Include in the response the status of those permits.

50. Provide copies of any documents submitted to any local, state, or federal agencies not included in the application.

51. Provide a copy of any communication with the Federal Aviation Administration (FAA) or the Kentucky Airport Zoning Commission regarding the project.

52. Explain whether an Engineering, Procurement, and Construction (EPC) firm has been selected for the project. Provide the request for proposal (RFP) for the EPC contractor.

53. Explain whether any existing structures on the project site will be demolished during the construction phase of the project.

54. Explain and provide documentation for any communication that has occurred between representatives of Lost City Renewables and any of the property owners surrounding the project. Include in the explanation whether any changes have been made to the project based upon these communications.

55. Explain whether participating landowners will continue to use property not leased to Lost City Renewables for residential or agricultural purchases.

56. Provide if any additional community meetings are planned and the details of those meetings.

57. Explain whether the project will have a battery storage system. If a battery storage system is going to be utilized, provide the following:

- a. Safety data sheets for the energy storage system.
- b. The environmental impact of the battery storage system.
- c. Expected life of the batteries.
- d. Method to dispose of batteries at the end of the useful life.
- e. How the battery storage system installation will comply with National

Fire Protection Association Standard 855.

58. Explain steps taken to ensure that runoff from the batteries will not contaminate groundwater.

59. Provide detailed information on solar panels proposed for the project, including data sheets for the solar panels.

60. Provide detailed information on inverters proposed for the project, including data sheets for the inverters.

61. Provide a one line for the project.

62. Provide documentation for any endangered species sampling.

63. Provide documentation for any research completed for the project, including:

- a. Historical research of the project site.
- b. Archeological research of the project site.

64. Refer to SAR, Mitigation Measure 15. Explain how it was determined that two acres of native pollinator friendly vegetation would be installed.

65. Refer to SAR, Mitigation Measure 22. Explain how local governments will report damage from construction.

66. Refer to Application, Exhibit G, Economic Analysis, and Exhibit E, Public Involvement Activities. On page 13 of the Economic Analysis, property taxes are anticipated to be collected over the course of 40 years. On slide 6 of the Public Involvement Activities exhibit, Economic Impacts, \$88.8 million in labor income is said to be expected over the course of 30 years. Explain what the lifetime of the project is expected to be and reconcile the apparent discrepancy between the two exhibits.

67. Refer to the Application, Exhibit G, page 10, Spin-off Impacts in Muhlenberg County. Explain whether recipients of lease payments are included in additional spin-off jobs and employment.

68. Refer to Application, Exhibit H, Decommission Plan, Page 8, Table 3. Explain whether "Overhead and Management" includes wages, services, and material expenses that would benefit the county, region, and the Commonwealth of Kentucky.



Linda C. Bridwell, PE  
Executive Director  
Public Service Commission *on behalf*  
*of the* Kentucky State Board on  
Generation and Transmission Siting  
P.O. Box 615  
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DATED MAR 07 2025

cc: Parties of Record

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